

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
cgrusauskas@paulweiss.com
ANDREA M. KELLER (*Pro Hac Vice* admitted)
akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]
ORDER VACATING PTO 20
TRANCHE 4 CHALLENGE DEADLINES**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

STIPULATION

WHEREAS, on January 29, 2025, this Court entered an order (ECF 2168) requiring the parties to meet and confer concerning a plan for re-review of custodial records for privilege.

WHEREAS, the parties met and conferred on January 30, January 31, February 4, and February 6, 2025.

WHEREAS, the parties plan to continue conferring and will attend the February 12, 2025 status conference in-person as ordered.

WHEREAS, since many of the Tranche 4 custodians are already scheduled for deposition, and since the parties have agreed to a staged re-review process as outlined in their Joint Status Report filed on January 31, 2025 (ECF 2191), the parties respectfully and jointly request that the Court vacate the deadlines set forth in PTO 20 (ECF 1808) for Tranche 4 custodians.

WHEREAS, apart from the Parties' January 31, 2025 Joint Status Report request (ECF 2191), the Parties have not previously requested to modify the dates set forth in PTO 20 relating to Tranche 4.

WHEREAS, the dates sought to be vacated through this Stipulation will not impact the overall schedule of the case.

WHEREAS, specifically, the parties stipulate, agree, and request that the Court enter an order vacating the following PTO No. 20 deadlines: February 7, 2025 (end of conferral period and deadline and for Plaintiffs to select up to 15 log entries from the initial sample for inclusion in a joint letter); February 14, 2025 (parties to submit a joint letter to the Court addressing up to 15 disputed privilege log entries); February 28, 2025 (hearing on Tranche 4 dispute); 7 days after resolution of disputes (Uber shall de-designate and produce Tranche 4 documents consistent with the Court's order and concessions made by Uber during conferrals); and 21 days after resolution of dispute (Uber shall de-designate and produce documents from other production sets consistent with the Court's order and concessions by Uber during conferrals).

The Parties further stipulate and agree that, for the following deponents, Defendants will produce revised privilege logs and all documents de-designated or produced in redacted form and that revised log shall be produced in accordance with the following:

Deponent	Confirmed Deposition Date	Re-reviewed Log And (De-Designated Documents) Due
Parker, Kate	February 14, 2025	February 11, 2025
Richter, David	February 24, 2025	February 11, 2025
Joyce, Meghan	February 26, 2025	February 14, 2025
Luu, Jenny	February 27, 2025	February 18, 2025
Whaling, Kayla	February 28, 2025	February 18, 2025

IT IS SO STIPULATED.

DATED: February 7 , 2025

By: /s/ Michael B. Shortnacy
MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com
SHOOK, HARDY & BACON L.L.P.
2121 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (424) 285-8330
Facsimile: (424) 204-9093

PATRICK OOT (Admitted *Pro Hac Vice*)
oot@shb.com
SHOOK, HARDY & BACON L.L.P.
1800 K St. NW Ste. 1000
Washington, DC 20006
Telephone: (202) 783-8400
Facsimile: (202) 783-4211

KYLE N. SMITH (*Pro Hac Vice* admitted)
ksmith@paulweiss.com
JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)
jphillips@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
2001 K Street, NW
Washington DC, 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420

Attorney for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

DATED: February 7, 2025

By: /s/ Sarah R. London
Sarah R. London
**LIEFF CABRASER HEIMANN &
BERNSTEIN**
275 Battery Street, Fl. 29
San Francisco, CA 94111

Telephone: (415) 956-1000
slondon@lchb.com

By: /s/ Rachel B. Abrams
Rachel B. Abrams
**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
rabrams@peifferwolf.com

By: /s/ Roopal P. Luhana
Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, Fl. 12
New York, NY 10016
Telephone: (888) 480-1123
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

FILER'S ATTESTATION

I, Michael B. Shortnacy, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: February 7, 2025

BY: /s/ Michael B. Shortnacy
Michael B. Shortnacy

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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 IN RE: UBER TECHNOLOGIES, INC.,
13 PASSENGER SEXUAL ASSAULT
14 LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING
STIPULATION TO VACATE PTO 20
TRANCHE 4 CHALLENGE DEADLINES**

15 This Document Relates to:
16 ALL ACTIONS

17
18 PURSUANT TO STIPULATION, IT SO ORDERED:

19 1. The Stipulation Requesting the Court vacate the PTO 20 dates pertaining to Tranche 4 custodians
20 **GRANTED.**

21
22 **IT IS SO ORDERED.**

23 DATED: February ____, 2025

24 _____
LISA J. CISERNOS
United States Magistrate Judge
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